

**REQUEST FOR PRODUCTION NO. 1:** All documents related to any communication between El Paso County and the United States Department of Justice, including the Federal Bureau of Investigation, regarding election administration, voting, and/or possible incidents of

criminal activity conducted in connection with an election that occurred within El Paso County.

**RESPONSE:** There are no documents and/or materials that exist in our possession that are responsive to this request.

**REQUEST FOR PRODUCTION NO. 2:** All documents related to any communication between El Paso County and the United States Department of Homeland Security regarding election administration, voting, and/or possible incidents of criminal activity conducted in connection with an election that occurred within El Paso County.

**RESPONSE:** There are no documents and/or materials that exist in our possession that are responsive to this request.

**REQUEST FOR PRODUCTION NO. 3:** All documents related to any communication between El Paso County and the United States Department of State regarding election administration, voting, and/or possible incidents of criminal activity conducted in connection with an election that occurred within El Paso County.

**RESPONSE:** There are no documents and/or materials that exist in our possession that are responsive to this request.

**REQUEST FOR PRODUCTION NO. 4:** Please provide copies of all search warrants, warrants of arrest, criminal complaints, indictments, arraignments, and/or judgments or orders of conviction, in your care, custody, and control, related to any violations or alleged violations of the Texas Election Code that have occurred in El Paso County since January 1, 2016.

**RESPONSE:** There are no documents and/or materials that exist in our possession that are responsive to this request.

**REQUEST FOR PRODUCTION NO. 5:** Please provide copies of all documents, including but not limited to guidance documents or informational materials, related to the use of drive-thru voting, curbside voting, 24-hour polling locations, or multiple mail-in ballot delivery

locations in or by El Paso County during the 2020 primary, primary runoff, or general election.

**OBJECTION:** DA Rosales objects to this request to the extent that the information requested is obtainable from some other source that is actually the official keeper of this information. DA Rosales would note that the request for Production that was received also included another defendant who is not a district attorney, but rather an election official with a different government function. Therefore, some of the requests are not relevant or applicable to DA Rosales.

**RESPONSE:** There are no documents and/or materials that exist in our possession that are responsive to this request.

**REQUEST FOR PRODUCTION NO. 6:** Please provide copies of all documents, including but not limited to guidance documents or informational materials, related to voting practice that El Paso County introduced during the 2020 primary, primary runoff, or general election.

**OBJECTION:** DA Rosales objects to this request to the extent that the information requested is obtainable from some other source that is actually the official keeper of this information. DA Rosales would note that the request for Production that was received also included another defendant who is not a district attorney, but rather an election official with a different government function. Therefore, some of the requests are not relevant or applicable to DA Rosales.

**RESPONSE:** There are no documents and/or materials that exist in our possession that are responsive to this request.

Respectfully submitted,

By: /s/ Roger Rodriguez

Roger Rodriguez

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**ATTORNEY FOR DEFENDANT  
YVONNE ROSALES, IN HER  
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ATTORNEY FOR EL PASO,  
HUDSPETH, AND  
CULBERSON COUNTIES**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically on May 11, 2022 with the Clerk of the Court for the U.S. Western District of Texas by using the CM/ECF system, causing electronic service upon all counsel of record.

/s/ Roger Rodriguez

Roger Rodriguez